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DJ 5-52-20275
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U.S. Department of Justice

Tax Division

Please reply to: Civil Trial Section, Northern Region
P.O. Box 55
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March 4, 2019

Via ECF

Hon. I. Leo Glasser
Eastern District of New York
United States Courthouse
22 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Moshe Lax, et al.*,
1:18-cv-04061 (E.D.N.Y.)

Dear Judge Glasser:

I am attorney for the United States of America in the above-referenced action. Defendant Zlaty Schwartz and the United States (the "Parties") have briefed and argued a motion for modification of the Court's preliminary injunction (the "Motion"). DE 60, 75, 77, 79. Presently, a briefing schedule is in effect for supplemental briefs regarding the Motion. DE 87. I write to advise the Court that the Parties have reached an agreement to resolve the Motion.

The Motion concerns \$300,000 frozen by the preliminary injunction and held in escrow by counsel for Defendant Zlaty Schwartz. The Parties hereby stipulate that (1) the preliminary injunction should be modified to recognize that \$150,000 of that \$300,000 is no longer subject to the preliminary injunction (2) and that nothing in this stipulation will be taken to be an admission regarding the merits of the case.

Sincerely yours,

/s/ Steven Tennyson

STEVEN S. TENNYSON
Trial Attorney
Civil Trial Section, Northern Region

cc: All counsel of record via ECF